

1 KURT C. FAUX, ESQ.  
Nevada Bar No. 003407  
2 WILLI H. SIEPMANN, ESQ.  
Nevada Bar No. 002478  
3 JORDAN F. FAUX, ESQ.  
Nevada Bar No. 12205  
4 THE FAUX LAW GROUP  
2625 N. Green Valley Parkway, #100  
5 Henderson, Nevada 89014  
Telephone: (702) 458-5790  
6 Facsimile: (702) 458-5794  
Email: kfaux@fauxlaw.com  
7 wsiepmann@fauxlaw.com  
jfaux@fauxlaw.com  
8 *Attorneys for Platte River Insurance Company*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 PLATTE RIVER INSURANCE COMPANY, a  
Nebraska corporation,

12 Plaintiff,

13 v.

14 YAN HONG LIU dba C&L ENTERPRISE, a  
Nevada individual and sole proprietor; UFP DKY  
15 STORE 102, LLC, a Nevada limited liability  
company; BIG BIZ PRO, LLC, a Nevada limited  
16 liability company; DOES 1 through 10, and ROE  
CORPORATIONS 1 through 10, inclusive,

17 Defendants.  
18  
19

20 YAN HONG LIU dba C&L ENTERPRISE,

21 Counterclaimant,

22 v.

23 PLATTE RIVER INSURANCE COMPANY, a  
Nebraska corporation, and DOES 1-10,

24 Counterdefendants.

CASE NO.: 2:20-cv-00723-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND REPLY DEADLINE TO  
OPPOSITION TO MOTION FOR  
SUMMARY JUDGMENT**

**(FIRST REQUEST)**

1 Plaintiff/Counterdefendant, Platte River Insurance Company (“Platte River”), by and  
2 through its counsel, Kurt C. Faux, Esq. of the Faux Law Group, and Defendant/Counterclaimant,  
3 Yan Hong Liu dba C&L Enterprise (“C&L”), by and through its counsel, Jason M. Wiley, Esq. and  
4 E. Daniel Kidd, Esq. of Wiley Petersen (collectively referred to as the “Parties”), hereby submit the  
5 following Stipulation to Extend the Deadline for Platte River to File a Reply to C&L’s Opposition  
6 to Platte River’s Motion for Summary Judgment on its First Cause of Action [ECF No. 60]. The  
7 Parties hereby stipulate and agree as follows.

8 1. Platte River’s Motion for Summary Judgment on its First Cause of Action [ECF No.  
9 60] was filed on December 20, 2021 (hereinafter “Motion for Summary Judgment”).

10 2. A Stipulation and Order was entered granting C&L to January 24, 2022 to file an  
11 opposition. [ECF No. 64].

12 3. C&L filed its Opposition on January 24, 2022. [ECF No. 66].

13 4. Platte River’s Reply is due on February 7, 2022. [ECF No. 66].

14 5. Counsel for Platte River, Kurt C. Faux, Esq. will be preparing the Reply to the  
15 Opposition to the Motion for Summary Judgment. However, Mr. Faux has been out of state to  
16 attend a funeral related service of a mentor in Pleasant Grove, Utah, and a family function for a  
17 grandson in Idaho Falls, Idaho. Further, Nevada Power made certain energy modifications to the  
18 office of Faux Law resulting in Faux Law being unable to access its electronic files for  
19 approximately 48 hours (Faux Law stores all files electronically). Attorney Willi Siepmann has  
20 been out of the country commencing January 27, 2022, and returning on or about February 6, 2022.

21 6. Based on the foregoing, the Parties hereby stipulate and agree to extend the Reply  
22 deadline by 7 days so that the Reply is due on February 14, 2022.

23 7. There is good cause to extend the deadline as requested.

24 ///

1 IT IS SO STIPULATED AND AGREED.

2 DATED this 3rd day of February, 2022.

DATED this 3rd day of February, 2022.

3 THE FAUX LAW GROUP

WILEY PETERSEN

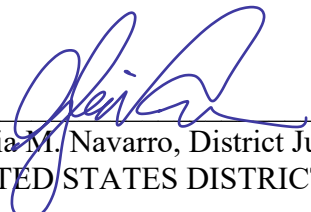
4 By: /s/ Kurt C. Faux  
KURT C. FAUX, ESQ. (#003407)  
5 2625 N. Green Valley Parkway, #100  
Henderson, Nevada 89014  
6 *Attorneys for Plaintiff/Counterdefendant*  
*Platte River Insurance Company*

By: /s/ Jason M. Wiley  
JASON M. WILEY, ESQ. (#009274)  
E. DANIEL KIDD, ESQ. (#10106)  
1050 Indigo Drive, Suite 200-B  
Las Vegas, NV 89145  
*Attorneys for Defendant/Counterclaimant*  
*Yan Hong Liu dba C&L Enterprise*

9 **ORDER**

10 **IT IS SO ORDERED.**

11 Dated this 3 day of February, 2022.

12  
13   
14 Gloria M. Navarro, District Judge  
UNITED STATES DISTRICT COURT

15 Submitted by:

16 The Faux Law Group

17 By: /s/ Kurt C. Faux  
KURT C. FAUX, ESQ.  
18 Nevada Bar No. 003407  
2625 N. Green Valley Parkway, #100  
19 Henderson, Nevada 89014  
*Attorneys for Platte River Insurance Company*